1	BILL LOCKYER, Attorney General				
2	of the State of California LORRIE M. YOST, State Bar No. 119088				
3	Deputy Attorney General California Department of Justice				
4	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -				
5	Sacramento, CA 94244-2550 Telephone: (916) 445-2271				
6					
7	Attorneys for Complainant				
8	BEFORE THE				
9	BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS				
10	STATE OF CALIFORNIA				
11	In the Matter of the Accusation Against:	Case No. 2006 - 200			
12	LEAH SUZANNE SEQUEIRA	ACCUSATION			
13	1645 Pyrenees #60 Stockton, CA 95210				
14	Registered Nurse License No. 332520				
15	Respondent.				
16	Complainant alleges:				
17	PARTIES				
18	1. Ruth Ann Terry, M.P.H., R.N. ("Complainant") brings this Accusation				
19	solely in her official capacity as the Executive Officer of the Board of Registered Nursing,				
20	Department of Consumer Affairs.				
21	2. On or about September 30, 1981, the Board of Registered Nursing				
22	("Board") issued Registered Nurse License Number 332520 to Leah Suzanne Sequeira				
23	("Respondent"). The license was in full force and effect at all times relevant to the charges				
24	brought herein and will expire on July 31, 2007, unless renewed.				
25	<u>JURISDICTION</u>				
26	3. Section 2750 of the Business and Professions Code ("Code") provides:				
27	"Every certificate holder or licensee, including licensees holding temporary licenses, or licensees holding licenses placed				
28	in an inactive status, may be disciplined as provided in this				

article [Article 3 of the Nursing Practice Act (Bus. & Prof Code, § 2700 et seq.)]. As used in this article, 'license' includes certificate, registration, or any other authorization to engage in practice regulated by this chapter. The proceedings under this article shall be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code [the Administrative Procedure Act], and the board shall have all the powers granted therein."

STATUTORY PROVISIONS

4. Code section 490 provides:

"A board may suspend or revoke a license on the ground that the licensee has been convicted of a crime, if the crime is substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued. A conviction within the meaning of this section means a plea or verdict of guilty or a conviction following a plea of nolo contendere. Any action which a board is permitted to take following the establishment of a conviction may be taken when the time for appeal has elapsed, or the judgment of conviction has been affirmed on appeal, or when an order granting probation is made suspending the imposition of sentence, irrespective of a subsequent order under the provisions of Section 1203.4 of the Penal Code."

5. Code section 2761, subdivision (a) provides:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- (a) Unprofessional conduct . . .
- (f) Conviction of a felony or of any offense substantially related to the qualifications, functions, and duties of a registered nurse, in which event the record of the conviction shall be conclusive evidence thereof."

6. Code section 2762 provides, in pertinent part:

"In addition to other acts constituting unprofessional conduct within the meaning of this chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this chapter to do any of the following:

(b) Use any controlled substance as defined in Division 10 (commencing with Section 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to himself or herself, any other person, or the public or to the extent that such use impairs

1	his or her ability to conduct with safety to the public the practice authorized by his or her license.			
2				
3	(c) Be convicted of a criminal offense involving the prescription, consumption, or self-administration of any of the			
4	substances described in subdivisions (a) and (b) of this section, or the possession of, or falsification of a record pertaining to, the			
5	substances described in subdivision (a) of this section, in which event the record of the conviction is conclusive evidence thereof.			
6	(d) Be committed or confined by a court of competent			
7	jurisdiction for intemperate use of or addiction to the use of any of the substances described in subdivisions (a) and (b) of this			
8	section, in which event the court order of commitment or confinement is prima facie evidence of such commitment or			
9	confinement.			
10	(e) Falsify, or make grossly incorrect, grossly inconsistent, or unintelligible entries in any hospital, patient, or other record			
11	pertaining to the substances described in subdivision (a) of this			
12	7. Code section 4022 provides:			
13	"'Dangerous drug' or 'dangerous device' means any drug			
14	or device unsafe for self-use in humans or animals, and includes the following:			
15	(a) Any drug that bears the legend: 'Caution: federal law			
16	prohibits dispensing without prescription,' 'Rx only,' or words of similar import.			
17	(b) Any device that bears the statement: 'Caution:			
18	federal law restricts this device to sale by or on the order of a, 'Rx only,' or words of similar import, the blank			
19	to be filled in with the designation of the practitioner licensed to use or order use of the device.			
20	(c) Any other drug or device that by federal or state			
21	law can be lawfully dispensed only on prescription or furnished pursuant to Section 4006."			
22	8. California Code of Regulations, title 16, section 1444, provides in			
23	pertinent part:			
24	"A conviction or act shall be considered to be substantially			
25	related to the qualifications, functions or duties of a registered nurse if to a substantial degree it evidences the present or potential			
26	unfitness of a registered nurse to practice in a manner consistent with the public health, safety, or welfare."			
27	///			
28	<i>///</i>			

Cost Recovery

9. Code section 125.3 provides that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

DRUGS

10. "Demerol" is a brand of meperidine hydrochloride, a derivative of pethidine, and is a Schedule II controlled substance as designated by Health and Safety Code section 11055, subdivision (c)(17), and a dangerous drug within the meaning of Code section 4022.

Background

- 11. On or about February 12, 2003, Respondent was on duty at Lodi Memorial Hospital, located in Lodi, California, assigned to Patient "A." Respondent was observed by co-workers to be sweating profusely; her face was red, and she had difficulty staying awake. Respondent fell asleep at the nurse's station and later, upon waking, commented that she was unable to function. During her shift, Respondent failed to make charting entries in Patient "A's" progress record.
- 12. At approximately 0410 hours, February 13, 2003, Respondent recorded that she had obtained a 75mg. dose of Demerol, a controlled substance and a dangerous drug, for administration to Patient "A." Thereafter, Respondent failed to document or record the administration of that medication on the patient's medication administration record, or to otherwise account for the disposition of the medication.

FIRST CAUSE FOR DISCIPLINE

(False or Grossly Inconsistent Record Entries)

13. Respondent's registered nurse license is subject to discipline under Code section 2761, subdivision (a) for acts of unprofessional conduct defined under Code section 2762, subdivision (e), in that she made false, grossly incorrect, or grossly inconsistent entries in hospital, patient, or other records as set forth under paragraphs 11 and 12.

SECOND CAUSE FOR DISCIPLINE

(Incompetence)

14. Respondent's license is subject to discipline for unprofessional conduct under Code section 2761, subdivision (a), for commission of acts of the acts of incompetence as set forth above under paragraphs 11 and 12.

THIRD CAUSE FOR DISCIPLINE

(Unprofessional Conduct)

15. Respondent's license is subject to discipline under Code section 2761, subdivision (a), for commission of acts of unprofessional conduct, as more particularly described under paragraphs 11 and 12.

FOURTH CAUSE FOR DISCIPLINE

(Conviction of Crime)

- and 2761, subdivision (f), in that on or about November 6, 1997, in the case entitled, *The People v. Leah Suzanne Sequeira* (Super. Ct. San Joaquin County, 1997, No. MM017518A) Respondent was convicted upon a plea of guilty of violating Vehicle Code section 23152, subdivision (B) (drunk driving), a misdemeanor, and a crime substantially related to the qualifications, functions, or duties of a registered nurse within the meaning of California Code of Regulations, title 16, section 1441.
- 17. The circumstances of the conviction are that on or about October 5, 1997, Respondent drove a vehicle with a concentration of 0.08 percent or more, by weight, of alcohol in her blood. Following conviction, Respondent was sentenced to serve 10 days in jail.

FIFTH CAUSE FOR DISCIPLINE

(Dangerous or Injurious Use of an Alcoholic Beverage)

18. Respondent's license is subject to discipline under Code section 2761, subdivision (a), for commission of acts of unprofessional conducted as defined under Code section 2762, subdivision (b), in that, as set forth under paragraphs 16 and 17, Respondent used

an alcoholic beverage to such an extent or in such a manner as to be dangerous or injurious to 1 2 Respondent, any other person, or the public. 3 SIXTH CAUSE FOR DISCIPLINE (Conviction of a Criminal Offense Involving the 4 5 Consumption of an Alcoholic Beverage) Respondent's license is subject to discipline under Code section 2761, 6 19. 7 subdivision (a), for commission of acts of unprofessional conduct as defined under Code section 8 2762, subdivision (c), in that, as set forth under paragraphs 16 and 17, Respondent was convicted 9 of crimes involving the consumption of an alcoholic beverage. SEVENTH CAUSE FOR DISCIPLINE 10 11 (Confinement by a Court for the Intemperate 12 Use of an Alcoholic Beverage) 13 20. Respondent's license is subject to discipline under Code section 2761, 14 subdivision (a), for commission of acts of unprofessional conducted as defined under Code 15 section 2762, subdivision (d), in that, as set forth under paragraphs 16 and 17, Respondent 16 was confined by the court for the intemperate use of an alcoholic beverage. 17 /// 18 /// 19 /// 20 /// 21 /// 22 /// 23 /// 24 /// 25 /// 26 /// 27 /// 28 ///

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing the Board issue a decision:

- Revoking or suspending Registered Nurse License Number 332520,
 issued to Leah Suzanne Sequeira;
- 2. Ordering Leah Suzanne Sequeira to pay the reasonable costs incurred by the Board in the investigation and enforcement of this case pursuant to Code section 125.3; and,
 - 3. Taking such other and further action as deemed necessary and proper.

DATED: 4(21/04

RUTH ANN TERRY, M.P.H., R.N

Executive Officer

Board of Registered Nursing Department of Consumer Affairs

State of California Complainant

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BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of the Accusation Against:)) No. 89-32
LEAH SUZANNE SEQUEIRA 470 South Columbia #4 Seaside, Oregon 97138 Registered Nurse License No. F 332520) OAH NO. N-32299))))
Respondent.) _)
<u>D</u>	ECISION
-	cision of the Administrative Law
Judge is hereby adopted by the $_$	Board of Registered Nursing
	as <u>its</u> Decision in the
above-entitled matter.	
This Decision shall become	me effective on March 1, 1990
IT IS SO ORDEREDJanu	ary 29, 1990
	Roard of Registered Nursing Roard E Boone R.N. President

BEFORE THE BOARD OF REGISTERED NURSING DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA

In the Matter of the Accusation Against:)))	No. 89-32
LEAH SUZANNE SEQUEIRA 470 South Columbia #4 Seaside, Oregon 97138 Registered Nurse License No. F 332520))))	OAH NO. N-32299
Respondent.))	

PROPOSED DECISION

On September 7, 1989, in Sacramento, California, Harvey R. Zall, Administrative Law Judge, Office of Administrative Hearings, State of California, heard this matter.

Steven M. Kahn, Deputy Attorney General, represented complainant.

Respondent represented herself.

Evidence was received, the record was closed and the matter was submitted.

FINDINGS OF FACT

The parties stipulated to the matters set forth in Findings I through IV.

I

Catherine M. Puri, R.N., Ph.D., the Executive Officer, Board of Registered Nursing, Department of Consumer Affairs, State of California, made and filed the Accusation in her official capacity.

ΙT

On September 30, 1981, complainant Board issued registered nurse license number F 332520 to Leah Suzanne Sequeira (hereinafter "respondent"). The license was in full force and effect at all times relevant herein. The license will expire by operation of law July 31, 1989, unless otherwise renewed.

III

"Demerol," a brand of meperidine hydrochloride, a derivative of pethidine, is a Schedule II controlled substance as designated by Health and Safety Code section 11055(c)(16).

"Percocet," a brand of oxycodone hydrochloride, is a Schedule II controlled substance as designated by Health and Safety Code section 11055(b)(1)(N).

IV

Respondent has subjected her license to discipline under Business and Professions Code section 2761(a) on the grounds of unprofessional conduct as defined in section 2762(e) in that on July 5, and 7, 1987, while employed as a registered nurse at St. Joseph's Hospital, Stockton, California she falsified, or made grossly incorrect, grossly inconsistent, or unintelligible entries in hospital and patient records pertaining to Demerol and Percocet, controlled substances, in the following respects:

Patient Cynthia F.

- a. On July 5, 1987, at 1530, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Cynthia F., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- b. On July 5, 1987, at 1820, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Cynthia F., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- c. On July 5, 1987, at 2115, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Cynthia F., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- d. On July 5, 1987, at 2200, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Cynthia F., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- e. On July 7, 1987, at 2140, on the Controlled Substances Disposition Record, she signed out one tablet of Percocet, for patient Cynthia F., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

Patient Coleen K.

- f. On July 5, 1987, at 1730, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Coleen K., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- g. On July 5, 1987, at 2020, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Coleen K., but charted the administration in the patient's medication record as having been given at 2250 and failed to make an entry in the nursing notes to indicate location and intensity of pain and effect of the medication.

Patient Erlinda G.

- h. On July 5, 1987, at 1615, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Erlinda G., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- i. On July 5, 1987, at 1915, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Erlinda G., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- j. On July 5, 1987, at 2215, on the Controlled Substances Disposition Record, she signed out one tablet of Percocet, for patient Erlinda G., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

Patient Lucia S.

k. On July 7, 1987, at 2100, on the Controlled Substances Disposition Record, she signed out one tablet of Percocet for patient Lucia S., but charted the administration in the patient's medication record as having been given at 2300 and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

Patient Liwayway F.

1. On July 7, 1987, at 1630, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Liwayway F., noted on the disposition record that the medication had been wasted, but entered on the patient's medication record the time 1515 (circled) as the time the medication was not given and failed to make an entry in the nursing notes to indicate reasons for wasting the medication.

m. On July 7, 1987, at 1930, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Liwayway F., charted the administration on the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

V

Respondent presented substantial evidence of mitigation and rehabilitation. The conduct of respondent that forms the basis of the present Accusation took place during a time in which respondent was under extreme emotional stress. On a date not established by the evidence, but sometime between January and June 1987, respondent became romantically involved with a married man. The man's wife learned about the relationship and began to harass and threaten respondent. The woman frequently made hostile telephone calls to respondent at her residence and at her place of employment. Respondent's car was vandalized. In an effort to alleviate the situation, respondent first changed her telephone number and then moved to another address. However, on July 3, 1987, the woman came to respondent's residence and there was an angry exchange. The first week of July 1987 was the most stressful period of time in respondent's life.

Respondent has never been involved in the personal use of any controlled substance. The man with whom respondent was romantically involved in 1987 did not use drugs of any sort.

On a date not established by the evidence, but sometime after the incidents of July 5 through July 7, 1987, and before July 1988, respondent was arrested for failing to keep her nursing records. At the urging of a law enforcement officer, not otherwise identified by the evidence, respondent entered a drug rehabilitation program in San Joaquin County. Respondent participated in the program for a three month period between July and September 1988. She attended three half hour sessions twice a week. Respondent successfully completed the program on September 9, 1988. The criminal charges against respondent were dropped.

On a date not established by the evidence, but sometime after the incidents of July 1987, an investigator from complainant Board visited respondent at her residence. The investigator requested respondent provide him with a urine sample, but respondent refused to do so.

Before she was employed by Saint Joseph Hospital in 1987, respondent worked for approximately two and a half years as a registered nurse at San Joaquin County General Hospital. After leaving Saint Joseph Hospital, respondent joined the nursing staff of Modesto Memorial where she worked for approximately ten months from December 1987 to September 1988. In September 1988, respondent moved to Oregon where she has been and continues to work as a registered nurse.

Since the July 1987 incidents, respondent has had no problems with "charting". Respondent takes special care to ensure that all of

the required entries are made in the appropriate charts and nursing notes.

Respondent would like to return to California in the near future and resume her nursing career. Respondent is eager to retain her license.

VI

Complainant Board recommended a stayed revocation with respondent being placed on probation subject to appropriate terms and conditions, including a number of conditions specifically related to drug dependency.

DETERMINATION OF ISSUES

Clear and convincing evidence to a reasonable certainty establishes cause for discipline of respondent's license for violation of Business and Professions Code sections 2761(a) and 2762(e).

ORDER

Ι

License No. F 332520, issued to respondent Leah Suzanne Sequeira, is revoked. However, said revocation is stayed and respondent is placed on probation for three (3) years upon the following terms and conditions:

- 1. Respondent shall obey all the laws of the United States, State of California, and all rules, regulations and laws pertaining to the practice of nursing in this State.
- 2. Respondent shall fully and completely comply with the probation program established by the Board and cooperate with representatives of the Board.
- 3. During the period of probation respondent shall report in person to such meetings of the Board of Registered Nursing or its designated representatives, as directed.
- 4. In the event respondent should leave California to reside or practice outside of the State, respondent shall comply with conditions of the probation program as directed by the Board. Periods of residency outside California will not apply to the reduction of this probationary period.

If during the period of probation, an accusation has been filed against respondent's license or the Attorney General's office has been requested to prepare an accusation against respondent's license such period shall automatically be extended and shall not expire until the accusation has been acted upon by the Board.

- 5. During the period of probation respondent shall submit such written reports and verification of actions as are required by the Board.
- 6. During the period of probation respondent shall engage in the practice of nursing in the State of California for a minimum of six months.
- 7. Respondent shall inform the Board and shall obtain the Board's approval of any agency for which respondent provides nursing services.

 The agency shall be informed of the reason for and terms of probation and shall submit performance evaluations and other reports as requested by the Board.
- 8. The Board shall be informed of and approve of the type of supervision provided while the respondent is functioning as a registered nurse. Respondent may not function as a supervisor.
- 9. Respondent may not work for a nurses' registry; or as a faculty member in an approved school of nursing; or as an instructor in a Board-approved nursing continuing education course.
- 10. Respondent shall begin and successfully complete course(s) in nursing prior to providing direct patient care and prior to the end of the probationary term. The content of such course(s) and the place and conditions of instruction shall be approved by the Board prior to enrollment. The respondent shall provide written proof of enrollment and written proof of successful completion of such course(s) to the Board by the agency or entity instructing the respondent.
- 11. Respondent, within 45 days of the effective date of this decision, shall have a physician submit, in a format acceptable to the Board,

an assessment of the respondent's physical condition and capability to perform the duties of a professional registered nurse. If medically determined, a recommended treatment program will be instituted and followed by the respondent with the physician providing written reports to the Board.

12. Respondent shall successfully complete, or shall have successfully completed a rehabilitation program which the Board approves and shall have reports submitted by the program. If a program was not successfully completed prior to the period of probation, the respondent, within a reasonable period of time as determined by the Board but not exceeding 90 days of the effective date of this Decision shall be enrolled in such a program.

In addition, respondent must attend support groups (e.g. Narcotics Anonymous, Alcoholics Anonymous, nurse-support groups, etc.) as directed by the Board.

- 13. Respondent shall completely abstain from the personal use of all psychotropic drugs, including alcohol, in any form except when the same are lawfully prescribed.
- 14. Respondent shall participate or shall have participated in a drug screening program which the Board approves and shall have reports submitted by the program.

Respondent, at any time during the period of probation, shall fully cooperate with the Board or any of its representatives in their supervision and investigation of compliance with the terms and conditions of probation; and shall, when requested, submit to such tests and samples as the Board or its representatives may require for the detection of alcohol, narcotics, hypnotics, dangerous drugs, or controlled substances.

15. Respondent shall notify Board of Registered Nursing at least 60 days prior to returning to California to resume work as a Registered Nurse.

Dated: 0 cto ber 23, 1989

IARVEY R. ZALL

Administrative Law Judge Office of Administrative Hearings

JOHN K. VAN DE KAMP, Attorney General of the State of California 2 STEVEN M. KAHN Deputy Attorney General 3 STATE'S 1515 K Street, Suite 511 EXHIBIT P. O. Box 944255 4 Sacramento, California 94244-2550 Telephone: (916) 324-5338 5 Attorneys for Complainant 6 7 8 9 BEFORE THE BOARD OF REGISTERED NURSING 10 DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA 11 12 No. 89-32In the Matter of the Accusation Against: 13 LEAH SUZANNE SEQUEIRA ACCUSATION 14 3286 Blue Ridge Circle #2 Stockton, California 95209 15 Registered Nurse License No. F 332520 16 Respondent. 17 18 Catherine M. Puri, R.N., Ph.D., for causes for 19 discipline, alleges: 20 21 l. Complainant Catherine M. Puri, R.N., Ph.D., makes 22 and files this accusation in her official capacity as Executive Officer, Board of Registered Nursing, Department of Consumer 24 Affairs. 25

26

2. On September 30, 1981, the Board of Registered

27 Nursing issued registered nurse license number F 332520 to Leah

Suzanne Sequeira. The license was in full force and effect at all times pertinent herein. The license will expire July 31, 1989, unless renewed.

3. Under Business and Professions Code section 2750, the Board of Registered Nursing may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 of the Nursing Practice Act.

4. Drugs

"Demerol," a brand of meperidine hydrochloride, a derivative of pethidine, is a Schedule II controlled substance as designated by health and Safety Code section 11055(c)(15).

"Percocet," a brand of oxycodone hydrochloride, is a Schedule II controlled substance as designated by health and Safety Code section 11055(b)(1)(N).

5. Respondent has subjected her license to discipline under Business and Professions Code section 2761(a) on the grounds of unprofessional conduct as defined in section 2762(e) in that on July 5, and 7, 1987, while employed as a registered nurse at St. Joseph's Hospital, Stockton, California she falsified, or made grossly incorrect, grossly inconsistent, or unintelligible entries in hospital and patient records pertaining to Demerol and Percocet, controlled substances, in the following respects:

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Patient Cynthia F.

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- On July 5, 1987, at 1530, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Cynthia F., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- On July 5, 1987, at 1820, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Cynthia F., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- On July 5, 1987, at 2115, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol 16 for patient Cynthia F., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- On July 5, 1987, at 2200, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol 22 for patient Cynthia F., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the 25 effect of the medication.
- 26 On July 7, 1987, at 2140, on the Controlled 27 Substances Disposition Record, she signed out one tablet of

Percocet, for patient Cynthia F., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

Patient Coleen K.

- f. On July 5, 1987, at 1730, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Coleen K., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- g. On July 5, 1987, at 2020, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Coleen K., but charted the administration in the patient's medication record as having been given at 2250 and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

Patient Erlinda G.

11 |

- h. On July 5, 1987, at 1615, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Erlinda G., charted the administration in the patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.
- i. On July 5, 1987, at 1915, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Erlinda G., charted the administration in the

patient's medication record, but failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

j. On July 5, 1987, at 2215, on the Controlled Substances Disposition Record, she signed out one tablet of Percocet, for patient Erlinda G., but failed to chart the administration in the patient's medication record and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

10 Patient Lucia S.

k. On July 7, 1987, at 2100, on the Controlled Substances Disposition Record, she signed out one tablet of Percocet for patient Lucia S., but charted the administration in the patient's medication record as having been given at 2300 and failed to make an entry in the nursing notes to indicate location and intensity of pain and the effect of the medication.

Patient Liwayway F.

1. On July 7, 1987, at 1630, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Liwayway F., noted on the disposition record that the medication had been wasted, but entered on the patient's medication record the time 1515 (circled) as the time the medication was not given and failed to make an entry in the nursing notes to indicate reasons for wasting the medication.

m. On July 7, 1987, at 1930, on the Controlled Substances Disposition Record, she signed out 100 mg. of Demerol for patient Liwayway F., charted the administration on the

1 patient's medication record, but failed to make an entry in the 2 nursing notes to indicate location and intensity of pain and the 3 effect of the medication. 4 5 WHEREFORE, complainant prays a hearing be had and that 6 the Board of Registered Nursing make its order: 7 Revoking or suspending registered nurse license 1. 8 number F 332520, issued to Leah Suzanne Sequeira. 9 Taking such other and further action as may be 10 deemed appropriate. DATED: 9/2/8811 12 13 14 Executive Officer Board of Registered Nursing 15 Department of Consumer Affairs State of California 16 Complainant 17 18 19 20 21 22 23 24 25 **26** | 03579110-

COURT PAPER STATE OF CALIFORNIA STD 113 (REV. 8-72)

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